

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

JARED UHLICH,

*Plaintiff,*

v.

R3 EDUCATION, INC., MEDICAL  
UNIVERSITY OF THE AMERICAS, and  
JOHN AND JANE DOES 1-100,

*Defendants.*

C.A. No. 1:24-CV-12096-WGY

**JOINT STATEMENT FOR THE INITIAL SCHEDULING CONFERENCE**

The parties submit this Joint Statement in accordance with the Court's Notice of Scheduling Conference.

**I. Proposed Schedule for Discovery and Motions**

Event	Proposed Deadline
Initial Disclosures Served	November 27, 2024
Amendments to Pleadings	January 15, 2025
Fact Discovery Completed	June 30, 2025
Expert Reports Served	
Plaintiff's expert(s)	July 31, 2025
Defendants' expert(s)	August 31, 2025
Expert Depositions Completed	September 30, 2025
Summary Judgment	
Motions filed	September 30, 2025
Oppositions filed	21 days after motions filed
Replies filed	7 days after oppositions filed
Daubert Motions	October 31, 2025
Final Pretrial Conference	December 2026

Event	Proposed Deadline
Running Trial List	January 2026

## II. Discovery Limitations

The parties currently do not contemplate a need to modify the discovery limitations imposed by Federal and Local Rules.

## III. Phased Discovery

The parties do not believe the case is appropriate for phased discovery.

## IV. Magistrate Judge

The parties assent to assignment of this case to a Magistrate Judge for trial and pretrial proceedings.

## V. Settlement Proposal

Plaintiff has provided a settlement proposal to the Defendants in compliance with Local Rule 16.1(c).

## VI. Local Rule 16.1(d)(3) Certifications

Pursuant to Local Rule 16.1(d)(3), each party will file separately their certification affirming that each party and their counsel have conferred regarding the costs of litigation and alternatives to litigation and have conferred regarding alternative dispute resolution.

Dated: November 26, 2024

*Attorneys for Plaintiff Jared Uhlich*

/s/ Keith Altman

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**CERTIFICATE OF SERVICE**

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on November 26, 2024.

*/s/ Keith Altman*

Keith Altman